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1905-1992

October 9, 1997

VIA HAND DELIVERY

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37201

Re: *Universal Service Generic Contested case*  
Docket No: 97-00888

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Motion of AT&T Communications of the South Central States, Inc. to Reconsider Schedule.

Copies are being served on counsel of record.

Yours very truly,



Val Sanford

VS/ghc  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE , TENNESSEE**

**In re:            *UNIVERSAL SERVICE GENERIC CONTESTED CASE***

**Docket No:   97-00888**

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**MOTION OF AT&T COMMUNICATIONS OF THE SOUTH  
CENTRAL STATES, INC. TO RECONSIDER SCHEDULE**

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AT&T Communications of the South Central States, Inc. (here "AT&T") respectfully moves the Authority to reconsider the schedule for the disposition of this case; and for grounds states that:

1.        The basis for an expedited schedule in this matter was an effort to meet the February 6, 1998 deadline for completion of "forward-looking economic cost studies" as the basis for calculating federal universal service support in Tennessee, as set forth in paragraph 248 of the FCC's Order, adopted May 7, 1997 in Docket No. 96-45, *In the Matter of Federal-State Joint Board re Universal Service*.

2.        Given the decision not to attempt to complete those cost studies by February 6, 1998, there is no longer any necessity for an expedited schedule.

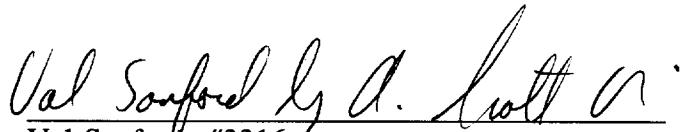
3.        However the final list of issues may be defined, it is evident that there are a host of crucial, complex, legal, policy and factual issues to be addressed in any consideration of any non-cost phase of this proceeding.

4.        The schedule distributed at the Authority's conference on October 7, 1997 (copy attached) does not include the filing of briefs with respect to legal issues, or provide for

addressing and determining preliminary issues, or provide for discovery. In addition that schedule provides for the filing of direct testimony on October 31, 1997, even though the issues such testimony is to address have not been specified and even though it will not be feasible for the parties adequately to address those issues in the limited time made available.

5. Under all the circumstances confronting the Authority and the parties, a revised schedule should be adopted on the basis of whatever final list of issues is adopted; which schedule should afford sufficient time for the parties to address and the Authority to determine; (i) any preliminary issues; (ii) issues of law on the basis of briefs; (iii) issues of policy and fact which may require discovery and testimony; and (iv) the nature and form of any final decision, incorporating all prior decisions in a comprehensive universal service plan.

WHEREFORE, AT&T respectfully urges the Authority to reconsider the schedule for the disposition of this matter.



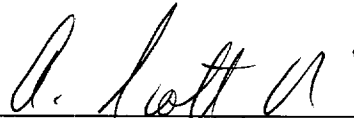
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion of AT&T Communications of the South Central States, Inc. to Reconsider has been served on counsel of record and other interested parties via hand delivery or First Class Mail postage prepaid, this 9TH day of October, 1997.



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October 6, 1997

IN RE: Universal Service - Proposed Dates  
Docket No. 97-00888

**Phase I- All Issues Except Cost Model Selection and Calculations**

October 31, 1997	Direct Testimony
November 7, 1997	Rebuttal
December 8-12, 1997	Hearings
January 13, 1998	Decisions on Phase I

**Phase II- Cost Model Selection & Calculations**

January 13, 1998	Pre-Hearing Conference -Schedule to Completion
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\* New FCC date may be available by this date.